



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

1200 Sixth Avenue, Suite 900  
Seattle, Washington 98101-3140

FEB 20 2014

OFFICE OF  
COMPLIANCE AND ENFORCEMENT

Reply To: OCE-127

**Certified Mail – Return Receipt Requested**

Marvin A. Lewallen  
Vice President – Environment, Energy & Sustainability  
Clearwater Paper Corporation  
601 West Riverside, Suite 1100  
Spokane, Washington 99201

Re: Clearwater Paper Corporation Pre-Test Feasibility Study

Dear Mr. Lewallen:

I am writing in response to your letter of February 3, 2014, in which you present Horizon Engineering's Pre-Test Feasibility Evaluation Study findings (Source Evaluation Report) on behalf of Clearwater Paper Corporation (Clearwater). We are encouraged that Clearwater remains committed to resolving the pending enforcement action cooperatively. EPA also remains committed to that goal. As explained below, however, we do not agree that additional process gas sampling is unlikely to provide additional valuable information for resolution of EPA's claims. EPA therefore requests that Clearwater provide a source test protocol for the sampling of points 1a, 2a, 1b, and 2b and proceed with scheduling the source testing as provided in EPA's July 19, 2013 Information Request with the modifications that have already been discussed and documented.

As an initial matter, EPA disagrees that the setups at Clearwater's M&D Digesters 1 and 2 are consistent with EPA's guidance. The Clean Air Act requirements require total hazardous air pollutant (HAP) emissions from each low volume high concentration (LVHC) system to be controlled by enclosing and venting emissions into a closed-vent system meeting the requirements of 40 C.F.R. § 63.450 and routing emissions to a control device that reduces HAP emissions in accordance with 40 C.F.R. § 63.443(d). The March 31, 2000 Questions and Answers document for the Pulp and Paper NESHAP Second Volume (40 CFR Part 63, Subpart S)<sup>1</sup>, Question 9, allows for a very narrow exception to these requirements for a specific HAP stream where a facility employs specific equipment and processes (referred to in this letter as a "setup").

The description in your letter of the criteria in EPA's guidance (fresh pocket purge steam, introduction of the remaining contaminated steam near the bottom of the chip bin, and chip bin level greater than 10 feet) ignores two key criteria: 1) the setup in EPA's guidance discusses and includes an illustration of a chip steamer, which Clearwater does not have on either M&D Digesters 1 or 2, and 2) the setup in EPA's guidance has chip bins whereas Clearwater's setup has sawdust bins. For these reasons, EPA has made clear from the beginning that – to the extent Clearwater is relying on EPA's guidance as a basis

---

<sup>1</sup> Referred to in your letter and here as "EPA's guidance."

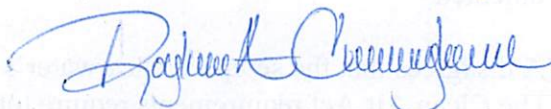
for not capturing and sending all HAP emissions from M&D Digesters 1 and 2 to a control device as required by 40 C.F.R. §§63.450 and 63.443(d) – Clearwater must demonstrate that its setups achieve the same control of HAP emissions as contemplated by EPA in issuing the guidance through an equivalency demonstration. Therefore, the testing required by EPA's July 19, 2013 Information Request continues to be relevant to EPA's claims.

The measured methanol mass emission rate cited in your letter and the Source Evaluation Report from the feasibility testing performed at the Clearwater facility during the week of December 2, 2013 do not provide this information. The results discussed in the Source Evaluation Report reflect a single test run from only one of four sampling points of interest, and the testing was done in the feasibility study context. Additionally, expression of the methanol emission rate in terms of pounds of methanol per oven dried ton of pulp is not appropriate, since only one of the two emission points on M&D Digester 1 was sampled. Methanol emissions measured at both sampling points on each digester must be added and then divided by the production rate of that digester in order to arrive at an emission rate that would be appropriate for comparison to the emission rate discussed in EPA's guidance.

We also note that the Source Evaluation Report emphasizes the uncertainties and potential difficulties with testing sampling points 1a, 2a, 1b, and 2b to a greater extent than was evident to EPA's field engineer during the feasibility project fieldwork. Given that the feasibility test run using Method 308 on sampling point 1a proceeded successfully, but that there are apparently increased concerns regarding the moisture content of the exhaust gas stream, EPA requests a technical conference call with Clearwater and Horizon personnel to be held during development of the test protocol.

In conclusion, EPA continues to require that Clearwater conduct the performance test as specified in EPA's July 19, 2013 Information Request (with the modifications discussed and documented to date or that may be documented in the approved source test protocol) as soon as reasonably possible, but no later than 60 days from the date of this letter.

Sincerely,



Roylene A. Cunningham  
Compliance Officer

cc via email: Lisa Carlson  
Idaho Attorney General's Office

Elizabeth Loeb  
Department of Justice

Zach Hedgpeth  
Environmental Protection Agency

Julie Vergeront  
Environmental Protection Agency